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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

14 CLYDE C. GIVENS,
15
16

17 Plaintiff,

18 v.

19 SETERUS, INC.; EQUIFAX
INFORMATION SERVICES, LLC; and
20 TRANS UNION LLC,

21 Defendants.

Case No. 2:19-cv-01009-RFB-BNW

**JOINT MOTION TO EXTEND TIME TO
FILE STIPULATION OF DISMISSAL OF
TRANS UNION LLC**

[FIFTH REQUEST]

Complaint filed: June 13, 2019

22 Plaintiff Clyde C. Givens (“Plaintiff”) and Defendant Trans Union LLC; (“Trans Union”
23 or “Defendant”) (collectively, the “Parties”), by and through their counsel of record, hereby move
24 jointly to extend their deadline to file a Stipulation of Dismissal of Trans Union thirty (30) days:
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26 1. The Parties settled this matter on July 11, 2019. [ECF Dkt. 8]
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1 2. Per the Court's Minute Order, on July 12, 2019, Plaintiff's Stipulation of Dismissal of
2 Trans Union was due August 26, 2019. [ECF Dkt. 9]

3 3. On August 22, 2019, the Court granted the Parties' stipulation to extend the time to
4 file the dismissal of Trans Union. [ECF Dkt. 20]

5 4. On October 3, 2019, the Court granted the Parties' stipulation to extend the time to
6 file the dismissal of Trans Union. [ECF Dkt. 31]

7 5. On November 12, 2019, the Court granted the Parties' stipulation to extend the time
8 to file the dismissal of Trans Union. [ECF Dkt. 44].
9

10 6. Although the Parties reached a general agreement on the terms of settlement in July
11 2019, one term of the settlement then required further discussion, which was resolved mid-
12 September 2019. Since then, however, Trans Union has not provided a draft settlement agreement to
13 Plaintiff for review, despite many inquiries by Plaintiff, including on October 7, 2019; October 16,
14 2019; November 6, 2019; November 27, 2019; December 3, 2019; December 11, 2019; and
15 December 12, 2019.
16

17 7. On December 26, 2019, the Court granted the Parties' stipulation to extend the time
18 to file the dismissal of Trans Union. [ECF Dkt. 47]

19 8. Plaintiff's deadline is February 6, 2020.

20 9. The Parties are in the final stages of completing their settlement agreement, for which
21 all material terms have been agreed to. All that remains is performance of the agreed-upon terms,
22 which that parties agree will be completed shortly.
23

24 10. The Parties request and extension of thirty days to file their Stipulation of Dismissal
25 of Trans Union to allow them additional time to finalize the settlement agreement.

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11. Plaintiff agrees to file the Stipulation of Dismissal of Trans Union no later than
March 9, 2020.

IT IS SO STIPULATED.
Dated February 6, 2020.

KNEPPER & CLARK LLC <u>/s/ Matthew I. Knepper</u> Matthew I. Knepper, Esq. Nevada Bar No. 12796 Miles N. Clark, Esq. Nevada Bar No. 13848 5510 So. Fort Apache Rd, Suite 30 Las Vegas, NV 89148 Email: matthew.knepper@knepperclark.com Email: miles.clark@knepperclark.com HAINES & KRIEGER LLC David H. Krieger, Esq. Nevada Bar No. 9086 8985 S. Eastern Avenue, Suite 350 Las Vegas, NV 89123 Email: dkrieger@hainesandkrieger.com <i>Counsel for Plaintiff</i>	QUILLING SELANDER LOWNDS WINSLETT & MOSER, P.C. <u>/s/ Jennifer R. Bergh</u> Jennifer R. Bergh, Esq. Nevada Bar No. 14480 6900 N. Dallas Parkway, Suite 800 Plano, Texas 75024 Email: jbergh@qslwm.com ALVERSON TAYLOR & SANDERS Trevor Waite, Esq. Nevada Bar No. 13779 6605 Grand Montecito Parkway, Suite 200 Las Vegas, NV 89149 Email: twaite@alversontaylor.com <i>Counsel for Defendant Trans Union LLC</i>
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ORDER GRANTING EXTENSION OF TIME

TO FILE STIPULATION OF DISMISSAL OF TRANS UNION LLC

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 7th day of February, 2020.